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FCC, Wash. D.C. 20554

re Docket No. 95-155
3-20-02
ex party letter

Hello.

Attached are summarized my Comments which will be my (monthly) Opinion Editorial on the last page of Americas Network magazine to be dated May 1, 2002.

I hereby restate some of my recommendations as they relate to Commission deliberations related to it's new rule making for the free call 800 system - as follows;

> In accordance with the provisions of the new Communications Act, the Commission must Order total divestiture of all number administration by the BOC's and Telecordia to a neutral third party.

> Fees to cover the expense must be the same as existing neutral party number administration which the Commission Ordered years ago.

> By the shifting of administration and adoption of the same funding methodology to 800 type operations, millions of expense related to charging a fee for every free call (the dip fee), and a monthly fee for every free call number in the data base will be eliminated.

> RespOrg revenues must then be addressed by this Order. Suggestions are to permit the transport RespOrg to absorb associated costs as part of transport fees. Or RespOrg revenue could be a one time competitive charge to search, obtain and implement numbers for users. There may be other methods that the parties might recommend.

> Numbers must be recognized as having value to a user. The Commission has an unparalled knowledge of establishing value for intangible use for things it administers. I recommend new codes be listed for 30 days on ebay (which may be less costly than the Commission doing it directly as many items may be only a dollar or two). Auction revenues for use of a number could flow either to the Commission or to offset expenses of neutral administration of the system. Some thought might be given to numbers returned to the system by their automatically being posted on the auction web site that the Administrator would control - with Commission oversight.

The above would moot and allow dismissal of many Petitions now before the Commission.

Respectfully submitted

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Attached 2 pp column in Word